

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RICHARD L. STONE and KIRBY
McINERNEY LLP,

Docket No: 08-CV-5171

Plaintiffs

- against -

EDWARD T. JOYCE; EDWARD T. JOYCE &
ASSOCIATES, P.C.; PAUL M. WEISS; FREED &
WEISS, LLC; JOHN RANDY PATCHETT and
PATCHETT LAW OFFICE

**REQUEST FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE
PLEAD**

Defendants

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Defendants Edward T. Joyce and Edward T. Joyce & Associates, P.C. (collectively "Joyce"), by their counsel, hereby move this Court for an extension of time to answer or otherwise plead. In support of this Request, Joyce states as follows:

1. Joyce personally accepted service of the above-captioned complaint on or about June 18, 2008.
2. Joyce recently retained Roger Crane of Nixon Peabody LLP to represent them in this matter.
3. Joyce brings this Request seeking additional time to answer or otherwise plead in response to Plaintiffs' complaint.
4. This is Joyce's first request for an extension of time.
5. Joyce, through their attorneys, tried contacting Plaintiffs to seek their consent to this request for extension. Plaintiffs never responded to Joyce's request.
6. Joyce's request does not interfere with any other scheduled dates, and Plaintiffs are not prejudiced by this request.

WHEREFORE, Joyce respectfully requests an extension of time, up to and including July 21, 2008, to answer or otherwise plead.

Dated: June 27, 2008
City, State: New York, New York

Respectfully submitted,

/s/ Roger Crane
Roger Crane, RC 0469
Firm Name: Nixon Peabody
Address: 437 Madison Avenue
City/State/Zip: New York, NY 10022
Phone Number: 212-940-3000
Fax Number: 212-940-3111

CERTIFICATE OF SERVICE

This is to certify that on June 27, 2008, I caused a copy of the foregoing Request for Extension of Time to Answer or Otherwise Plead to be served by the Court's electronic filing system on counsel for plaintiffs Richard L. Stone and Kirby McInerney LLP,

Peter S. Linden, Esq.
Kirby McInerney LLP
830 Third Avenue, 10th Floor
New York, New York 10022

/s/ Roger R. Crane
Roger R. Crane

Dated: June 27, 2008